

James E. Cecchi  
John M. Agnello  
Donald A. Ecklund  
CARELLA, BYRNE, CECCHI  
OLSTEIN, BRODY & AGNELLO, P.C.  
5 Becker Farm Road  
Roseland, New Jersey 07068  
Tel: (973) 994-1700

Lionel Z. Glancy  
Robert V. Prongay  
Casey E. Sadler  
GLANCY PRONGAY & MURRAY LLP  
1925 Century Park East, Suite 2100  
Los Angeles, California 90067  
(310) 201-9150

*Attorneys for Lead Plaintiff Bin Qu*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CHAO SUN, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

DAQING HAN, XIAOLI YU, HONG LI,  
MING LI, LIAN ZHU, GUANGHUI CHENG,  
GUOBIN PAN, GUANGJUN LU, YUANPIN  
HE, MAZARS CPA LIMITED, MAZARS Scrl,  
WEISERMAZARS LLP, and TELESTONE  
TECHNOLOGIES CORPORATION,

Defendants.

Case No. 2:15-cv-00703-JMV-MF

**NOTICE OF MOTION FOR FINAL  
APPROVAL OF THE PROPOSED  
SETTLEMENT, CLASS  
CERTIFICATION, AND THE PLAN OF  
ALLOCATION**

**TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:**

PLEASE TAKE NOTICE that, pursuant to the Court's Order Preliminarily Approving Settlement and Providing for Notice ("Preliminary Approval Order," Dkt. No. 68), on March 6, 2018 at 10:30 a.m., Lead Plaintiff Bin Qu,<sup>1</sup> before the Hon. John Michael Vazquez, U.S.D.J. in Courtroom PO 3 at the U.S. Courthouse and Post Office Building, 2 Federal Square, Newark, New Jersey 07102, shall move the Court to enter a judgment and order (1) granting final approval of the settlement of this litigation; (2) granting class certification for settlement purposes; (3) and approving the Plan of Allocation of settlement proceeds and the form of Notice.

This motion is based on this Notice of Motion; the memorandum of points and authorities in support thereof; the Declaration of Donald A. Ecklund in Support of: (I) Lead Plaintiff's Motion for Final Approval of the Proposed Settlement, Class Certification, and the Plan of Allocation; and (II) Co-Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; the exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

Lead Plaintiff is unaware of any opposition to this motion. Pursuant to the Preliminary Approval Order, any objection to Lead Plaintiff's motion for final approval of the Settlement, certification of the Settlement Class or approval of the proposed Plan of Allocation for distribution of the Settlement Fund must be filed on or before a February 13, 2018. To date, no objections have been filed.

---

<sup>1</sup> All capitalized terms that are not otherwise defined herein have the same meanings as set forth in the Stipulation of Settlement dated February 8, 2017 ("Stipulation") that was filed with the Court on February 24, 2017. Dkt. No. 64-3.

A proposed order granting the requested relief will be submitted with the reply papers after the deadline for objecting to the Settlement has passed.

Dated: January 30, 2018

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.

By: s/ James E. Cecchi

James E. Cecchi  
John M. Agnello  
Donald A. Ecklund  
5 Becker Farm Road  
Roseland, New Jersey 07068  
(973) 994-1700

Lionel Z. Glancy  
Robert V. Prongay  
Casey E. Sadler  
GLANCY PRONGAY & MURRAY LLP  
1925 Century Park East, Suite 2100  
Los Angeles, California 90067  
(310) 201-9150

*Attorneys for Lead Plaintiff Bin Qu and Co-  
Lead Counsel for the Class*

**PROOF OF SERVICE**

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On January 30, 2018, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the District of New Jersey, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 30, 2018.

*s/ James E. Cecchi*

James E. Cecchi